

FILED
UNITED STATES DISTRICT COURT
District of Massachusetts
APR 22 2005 P 1:40

Civil Action
No. 05-10078-DPW

PETER A. CRAWFORD, Plaintiff)
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)
WOLVERINE, PROCTOR & SCHWARTZ, INC.,)
Steven F. Chilinski, Deepak S. Kulkarni,)
)
Defendants)
)
)

PLAINTIFF'S MOTION FOR LEAVE TO FILE
AN OPPOSITION EXCEEDING 20 PAGES

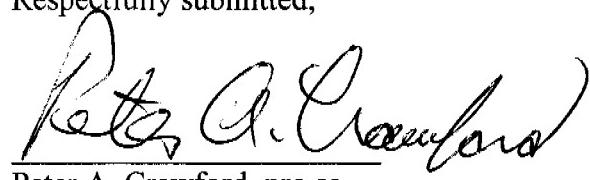
LOCAL RULE 7.1 CERTIFICATION

I certify that on April 22, 2005, I left a voice mail message with attorney for defendants Jeffrey D. Kuhn, indicating the length of the Opposition and requesting that he telephone me to confer regarding this motion. I did not hear back from him in time to narrow any issues relating to this motion.

MOTION

Plaintiff hereby moves, pursuant to Local Rule 7.1(b)(4), for leave to file his Opposition to Defendants' Motion for Partial Dismissal of 30 pages. In support thereof, plaintiff states that the motion to dismiss affects five of seven counts of the Complaint and over two thirds of the damages sought of nearly \$1.8 million, and advances three separate and distinct legal theories, and that the issues, particularly those relating to the Massachusetts Payment of Wages statute are very complex.

Respectfully submitted,



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Date: April 22, 2005